

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

In re:

R.E.X., INC.,

Case No. 20-30290

Chapter 11

Debtor.

APPLICATION TO EMPLOY C.P.A. FOR THE DEBTOR

The application of the debtor, R.E.X., Inc., respectfully represents:

1. On July, 2020, the Debtor filed a petition under Chapter 11 of the U.S. Bankruptcy Code.
2. Your Applicant has continued in possession of its property and your Applicant is now operating its commercial rental business.
3. The Debtor wishes to employ Paul Khoury as accountant for the Debtor.
4. Your Applicant has selected Paul Khoury for the reason that he has experience in matters of bankruptcy accounting, having previously prepared Chapter 11 Monthly Operating Reports for other entities.
5. To the best of the Debtor's knowledge, Paul Khoury has no connection with the creditors or any other party in interest, or their respective attorneys.
6. Paul Khoury represents no interest adverse to the Debtor in Possession or the estate in the matters upon which he has been engaged to represent the Debtor in Possession, and the employment of Paul Khoury would be in the best interest of the estate.
7. Paul Khoury seeks to be paid for professional services as follows:
 - a. Preparation of Monthly Operating Reports at the rate of \$75.00 per report.
 - b. \$200.00 per hour in connection with preparation of payroll, payroll tax returns, and other financial records necessary to the administration of the case.

WHEREFORE, the Debtor prays that the employment of Paul Khoury be approved under Subchapter V, of Chapter 11 of the Bankruptcy Code, and for such other and further relief as the Court deems appropriate.

R.E.X., Inc.

By Counsel

/s/ Joseph W. Caldwell
Joseph W. Caldwell, Esquire
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that the attached **DEBTOR'S APPLICATION TO EMPLOY C.P.A.** was served electronically upon the following:

ustpregion04.ct.ecf@usdoj.gov

- Office of the U.S. Trustee on this 18th day of August, 2020.

/s/ Joseph W. Caldwell

Joseph W. Caldwell